

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

vs.

MICHAEL J. BLACK

Defendant.

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Case No.: 19-CV-4137 (KAM)

**UNOPPOSED MOTION FOR COUNSEL TO MAKE
A LIMITED ENTRY OF APPEARANCE AND FOR AN
EXTENSION OF THE TEMPORARY RESTRAINING ORDER**

Defendant Michael J. Black, by and through counsel, Dickinson Wright PLLC, hereby respectfully moves that: (a) Seth Waxman be admitted as counsel of record in this case for the limited purpose of seeking an extension of the temporary restraining order (“TRO”); and (b) the Court extend the terms of the TRO for an additional two weeks through August 14, 2019. The government informed the undersigned that it has no objection to these requests. In support of these motions, Mr. Black states:

1. Dickinson Wright is working with Mr. Black to be retained in this matter. Due to the Court’s TRO, freezing certain of Mr. Black’s assets, it has been necessary for Mr. Black to be the beneficiary of untainted funds to pay for his defense in this matter. While Mr. Black expects resolution in the coming days, the necessary steps will not be completed prior to the preliminary injunction hearing currently scheduled for July 31, 2019. As a result, Mr. Black respectfully moves this Court to admit Seth Waxman for the limited purpose of seeking the TRO extension requested herein.

2. Pursuant to FRCP 65(b)(2), Mr. Black (*i.e.*, the adverse party) consents to a two-week extension of the TRO to allow Mr. Black to engage Dickinson Wright fully in this matter. Doing so would enable Dickinson Wright to receive compensation for its professional legal services, properly prepare for the preliminary injunction hearing, and take other steps necessary to effectively represent Mr. Black.

3. Securities and Exchange Commission (“SEC”) Counsel Kathleen Shields represented to the undersigned that the government has no objection to the requested two-week extension.

For these reasons, Mr. Black respectfully requests that: (a) Seth Waxman be admitted to this case for the limited purpose described herein; (b) and that the Court find good cause to extend the terms of the TRO for two weeks through August 14, 2019.

Dated this 30th day of July 2019.

Respectfully submitted,

_____/s/_____
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